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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	OFFICE OF THE SECRETA	ARY
Advanced Television Systems And Their Impact Upon the)) MM Docket No. 87-268)	
Existing Television Broadcast Service)	

To: The Commission

COMMENTS ON PETITIONS FOR RECONSIDERATION

The Rhode Island Public Telecommunications Authority (RIPTA), through its attorneys, hereby files its comments on the Petitions for Reconsideration and Clarification (Petitions) of the Commission's <u>Sixth Report and Order</u> in the above-referenced proceeding filed on June 13, 1997 by the Association for Maximum Service Television, Inc., the Broadcasters Caucus, et al. (Caucus) and by WNAC Argyle Television, Inc. (WNAC). In support thereof, the following is shown:

- 1. RIPTA is the licensee of public television Station WSBE-TV, Providence, Rhode Island. The Commission has assigned the station DTV Channel 21. RIPTA is satisfied with this channel.
- 2. WNAC has been assigned DTV Channel 54. Like a number of petitioners, WNAC has requested additional time following the release of OET Bulletin No. 69 to evaluate the situation with a view towards locating an in-core DTV allotment. Although is has not proposed a new DTV channel for RIPTA, the Caucus has asserted that the Northeast Corridor in which Station WSBE-TV is located will need adjustments.

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3. RIPTA wants at the earliest possible time to register its opposition to any proposal which would entail allotment to RIPTA of a DTV channel which is less desirable than Channel 21.¹ RIPTA has no objection to allotment to WNAC or other parties of new DTV channels as long as they do not entail allotment to RIPTA of such an inferior channel.

Respectfully submitted,

RHODE ISLAND PUBLIC TELECOMMUNICATIONS AUTHORITY

Malcolm G. Stevenson

SCHWARTZ, WOODS & MILLER 1350 Connecticut Avenue, N.W. Suite 300 Washington, D.C. 20036

202/833-1700

Its Attorneys

Date: July 18, 1997

RIPTA notes that neither WNAC nor the Caucus propose any specific change to RIPTA's DTV allotment. RIPTA reserves the right to address such a proposal should it subsequently be proffered.

CERTIFICATE OF SERVICE

I, Donna E. Trader, secretary in the law firm of Schwartz, Woods & Miller, do hereby certify that I have on this 18th day of July, 1997, sent by First Class United States mail, postage prepaid, copies of the foregoing **COMMENTS ON PETITIONS FOR RECONSIDERATION** to the following:

WNAC ARGYLE TELEVISION, INC.

Richard J. Bodorff, Esq. John M. Burgett, Esq. Wiley Rein & Fielding 1776 K Street, NW Washington, DC 20006

ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.

Victor Tawil, Sr. VP
Assoc. for Maximum Service Television, Inc.
1776 Massachusetts Ave., NW, Suite 310
Washington, Dc 20036

Jonathan D. Blake, Esq. Ellen P. Goodman, Esq. Victoria M. Huber, Esq. Covington & Burling 1201 Pennsylvania Ave., NW Washington, DC 20044-7566

ABC, INC.

Sam Antar, VP Law and Regulation 77 West 66th Street, 16th Floor New York, NY 10023

CBS, INC.

Mark W. Johnson, Esq. Associate General Counsel 600 New Hampshire Ave., NW, Suite 1200 Washington, DC 20037

NATIONAL ASSOCIATION OF BROADCASTERS

Henry L. Baumann, Esq. Exec. VP and General Counsel 1771 N Street, NW Washington, DC 20036-2891

ASSOCIATION OF AMERICA'S PUBLIC TELEVISION STATIONS

Marilyn Mohrman-Gillis VP, Policy and Legal Affairs 1350 Connecticut Ave., NW Washington, DC 20036

CHRIS-CRAFT INDUSTRIES, INC.

John C. Siegal, Senior VP 650 California Street San Francisco, CA 94108

NATIONAL BROADCASTING COMPANY, INC.

Michael J. Sherlock Exec. VP, Technology 30 Rockefeller Plaza, Suite 1022 New York, NY 10112

PUBLIC BROADCASTING SERVICE

Paula A. Jameson, Esq. Sr. VP, General Counsel & Secretary 1320 Braddock Place Alexandria, VA 22314

TRIBUNE BROADCASTING COMPANY

Dennis FitzSimons, Exec. VP 435 N. Michigan Avenue Chicago, IL 60611

A.H. BELO CORPORATION

Michael J. McCarthy, Esq. Sr. VP, Secretary, and General Counsel 400 South Record Street, 17th Floor Dallas, TX 75202

APPLE VALLEY BROADCASTING, INC.

and

TELEVISION WISCONSIN, INC.

and

SPOKANE TELEVISION, INC.

Robert J. Rini, Esq. Rini & Coran, PC 1350 Connecticut Ave., NW, Suite 900 Washington, DC 20036

BONNEVILLE INTERNATIONAL CORPORATION

David K. Redd, Esq. VP, Secretary, and General Counsel P.O. Box 1160 Salt Lake City, UT 84110-1160

BRUNSON COMMUNICATIONS, INC.

and

BROOKS BROADCASTING

GOLDEN EMPIRE TELEVISION CORPORATION

and

UNITED COMMUNICATIONS CORPORATION

Barry Wood

Wood & Brinton, Chtd. 2300 M Street, NW, Suite 900A Washington, DC 20037

ALLBRITTON COMMUNICATIONS COMPANY

Jerald N. Fritz VP Legal and Strategic Affairs 808 Seventeenth St., NW, Suite 300 Washington, DC 20006

BENEDEK BROADCASTING CORPORATION

K. James Yager Exec. VP Stewart Square Bldg. 308 West State Street, Suite 210 Rockford, IL 61101

CALIFORNIA OREGON BROADCASTING,

and

GANNETT BROADCASTING

and

LEE ENTERPRISES, INC.

Marnie K. Sarver, Esq. Reed Smith Shaw & McClay 1301 K Street, NW Suite 1100 - East Tower Washington, DC 20005

CAPITOL BROADCASTING COMPANY, INC.

and

HUBBARD BROADCASTING INC.

and

GRIFFIN TELEVISION, LLC

and

J.D.G. TELEVISION, INC.

and

NEWSWEB CORPORATION

and

WLEX, INC.

Marvin Rosenberg, Esq. Edward W. Hummers, Jr., Esq. Holland & Knight 2100 Pennsylvania Ave., NW, Suite 400 Washington, DC 20037-3202

COMMUNITY TELEVISION OF SOUTHERN CALIFORNIA

Susan E. Reardon, Esq. SR. VP and General Counsel 4401 Sunset Boulevard Los Angeles, CA 90027

CURATORS OF THE UNIVERSITY OF MISSOURI STATION KOMU-TV

Thomas Gray, GM Highway 63 South Columbia, MO 65201

DISPATCH BROADCASTING GROUP

R. Clark Wadlow, Esq. Sidley & Austin 1722 | Street, NW Washington, DC 20005

CHRONICLE BROADCASTING COMPANY

and

MIDWEST TELEVISION, INC.

and

PAXTON MEDIA GROUP, INC.

Jonathan D. Blake, Esq. Covington & Burling 1201 Pennsylvania Ave., NW Washington, DC 20044-7566

COSMOS BROADCASTING CORPORATION

Werner K. Hartenberger, Esq. **Dow Lohnes & Albertson** 1200 New Hampshire Ave., NW, Suite 800 Washington, DC 20036

DECATUR FOURSQUARE BROADCASTING.

INC.

Mark Dreistadt, GM 2510 Parkway Center Decatur, IL 62526

EAGLE COMMUNICATIONS, INC.

and

SARKES TARZIAN, INC.

Brian M. Madden, Esq. Leventhal Senter & Lerman 2000 K Street, NW, Suite 600 Washington, DC 20006

GRANITE BROADCASTING CORPORATION

Thomas W. Davidson, PC Akin Gump Strauss Hauer & Feld, LLP 1333 New Hampshire Ave., NW, Suite 400 Washington, DC 20036

JEFFERSON-PILOT COMMUNICATIONS COMPANY

Daniel K. McAlister, Esq. Sr. VP, General Counsel and Secretary 100 North Greene Street Greensboro, NC 27420

KTEN TELEVISION LIMITED PARTNERSHIP

Tom L. Johnson, President United Media, Inc., General Partner 101 E Main, Suite 300 Denison, TX 75020

LIN TELEVISION CORPORATION

Gregory M. Schmidt, Esq. VP-New Development and General Counsel 1001 G Street, NW Washington, DC 20001

MEREDITH CORPORATION

Philip A. Jones President-Broadcasting Group 1716 Locust Street Des Moines, IA 50309-3023

LINCOLN BROADCASTING COMPANY, A CALIFORNIA LIMITED PARTNERSHIP

Michael D. Berg, Esq.
Julian L. Shepard, Esq.
Verner Liipfert Bernhard McPherson & Hand
901 15TH Street, NW, Suite 700
Washington, DC 20005-2301

MAINE RADIO AND TELEVISION CO.

Lew Colby Exec. VP, CEO One Congress Square Portland, ME 04101

PAXSON COMMUNICATIONS CORPORATION - KZKI

Frank Martin Chief Engineer 9229 Utica Avenue, #155 Rancho Cucamonga, CA 91730

POST-NEWSWEEK STATIONS, INC.

Robert E. Branson VP, Legal Affairs 3 Constitution Plaza Hartford, CT 06103

QUINCY NEWSPAPERS, INC.

Thomas A. Oakley P.O. Box 909 130 South Fifth Street Quincy, IL 62306-0909

SANGER TELECASTERS, INC. (KMSG TV)

Diane D. Dostinich President 706 West Herndon Ave. Fresno, CA 93650

PETRACOM BROADCASTING, INC.

M. Scott Johnson, Esq. Gardner Carton & Douglas 1301 K Street, NW Suite 900 - East Tower Washington, DC 20005

PULITZER BROADCASTING COMPANY

Erwin G. Krasnow, Esq.
Julian L. Shepard, Esq.
Verner Liipfert Bernhard McPherson & Hand
901 15TH Street, NW, Suite 700
Washington, DC 20005-2301

RETLAW ENTERPRISES INC.

Carl R. Ramey Wiley Rein & Fielding 1776 K Street, NW Washington, DC 20006

SHOCKLEY COMMUNICATIONS CORPORATION

Jerold L. Jacobs, Esq. Rosenman & Colin LLP 1300 19th Street, NW, Suite 200 Washington, DC 20036

WIPB-TV

Robert R. Smith Station Manager E.F. Ball Building Ball State University Muncie, IN 47304

WMTW-TV

David Kaufman VP and General Manager P.O. Box 8 Auburn, ME 04210

WTTW/CHANNEL 11

Larry W. Ocker Sr. VP for Engineering 5400 N St. Louis Avenue Chicago, IL 60625

